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U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
SANTA ANABY                     

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UNITED STATES OF AMERICA

## UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

## SOUTHERN DIVISION

UNITED STATES OF AMERICA,	)	No. SA CR 08-223
	)	
Plaintiff,	)	<u>GOVERNMENT'S EX PARTE</u>
	)	<u>APPLICATION FOR ORDER</u>
v.	)	<u>UNSEALING INDICTMENT;</u>
	)	<u>DECLARATION OF TERRI K. FLYNN</u>
JERRY FANYUAN LIN,	)	
JASON I. MING WEI,	)	
REN SUI,	)	
a.k.a. "Jeffrey,"	)	
ERIK DAMIEN VICENTE,	)	
JOSE G. GARIBAY,	)	
a.k.a. "Guero,"	)	
SHANE KELTER,	)	
ADRIAN GARCIA DE ALBA,	)	
a.k.a. "Pedro,"	)	
JAGMOHAN S. DHILLON,	)	
PARAMIJT SINGH,	)	
a.k.a. "Pumma,"	)	
WALTHER EDGARDO ORELLANA	)	
AGUILAR,	)	
a.k.a. "Sharky,"	)	
FAUSTO VILLA PEREZ,	)	
MING CHIEN HSIEH,	)	
a.k.a. "Sonny,"	)	
HONG YEE CHOW,	)	
a.k.a. "Annie,"	)	
MARCO ANTONIO SILVA MOTA,	)	
ALEXANDER CHIANG POU,	)	
a.k.a. "Alex,"	)	

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2 NATHANAEL GARRARD LINEHAM, )  
3 a.k.a. "Nat," )  
4 MICHELLE ENCK, )  
5 Defendants. )  
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7 The United States of America hereby applies to this Court  
8 for an order unsealing the indictment in the above-captioned  
9 proceedings. In support of this application, the government  
10 submits the attached Declaration of Terri K. Flynn.

11 DATED: September 30, 2008

Respectfully submitted,

12 THOMAS P. O'BRIEN  
13 United States Attorney

14 ROBB C. ADKINS  
15 Assistant United States Attorney  
16 Chief, Santa Ana Office

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TERRI K. FLYNN  
Assistant United States Attorney

DECLARATION OF TERRI K. FLYNN

I, Terri K. Flynn, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Jerry Fanyuan Lin, et al., SA CR 08-223.

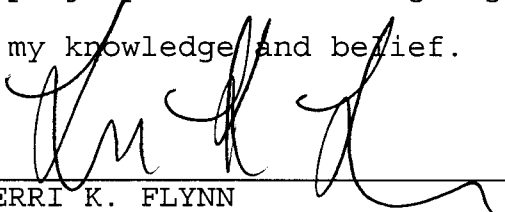
2. On September 28, 2008, defendant Jason I. Ming WEI was arrested pursuant to the indictment. Defendant Wei made his initial appearance on September 29, 2008. At that time, the government requested in writing that the indictment be unsealed as to defendant WEI, but that it be resealed as to all other defendants who had not yet been arrested.

3. On September 30, 2008, a number of the remaining defendants were arrested.

4. Accordingly, the government requests that the indictment in this case be unsealed.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED: September 30, 2008

  
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TERRI K. FLYNN